

FILED

5/17/2018

MC

THOMAS G. BRUTON
CLERK, U.S. DISTRICT COURT

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION

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MAY 01 2018

THOMAS G. BRUTON
CLERK, U.S. DISTRICT COURT

Jalen Hibbler

(Enter above the full name
of the plaintiff or plaintiffs in
this action)

vs.

Case No: 1:18-CV-01795
(To be supplied by the Clerk of this Court)

Div 9 (smv) Matthews

Div 9 (smv) Brown

Thomas J. Dart

(Enter above the full name of ALL
defendants in this action. Do not
use "et al.")

CHECK ONE ONLY:

☒

COMPLAINT UNDER THE CIVIL RIGHTS ACT, TITLE 42 SECTION 1983
U.S. Code (state, county, or municipal defendants)

☐

COMPLAINT UNDER THE CONSTITUTION ("BIVENS" ACTION), TITLE
28 SECTION 1331 U.S. Code (federal defendants)

☐

OTHER (cite statute, if known)

BEFORE FILLING OUT THIS COMPLAINT, PLEASE REFER TO "INSTRUCTIONS FOR FILING." FOLLOW THESE INSTRUCTIONS CAREFULLY.

I. Plaintiff(s):

- A. Name: Jalen Hibbler
- B. List all aliases: N/A
- C. Prisoner identification number: 20161112051
- D. Place of present confinement: COOK County Jail
- E. Address: P.O. Box 089002, Chicago, IL, 60608

(If there is more than one plaintiff, then each plaintiff must list his or her name, aliases, I.D. number, place of confinement, and current address according to the above format on a separate sheet of paper.)

II. Defendant(s):

(In A below, place the full name of the first defendant in the first blank, his or her official position in the second blank, and his or her place of employment in the third blank. Space for two additional defendants is provided in B and C.)

- A. Defendant: Div 9 (smu) Matthews
Title: Deputy Sheriff
Place of Employment: COOK County Jail
- B. Defendant: Div 9 (smu) Brown
Title: Deputy Sheriff
Place of Employment: COOK County Jail
- C. Defendant: Thomas J. Dart
Title: Deputy Director
Place of Employment: COOK County

(If you have more than three defendants, then all additional defendants must be listed according to the above format on a separate sheet of paper.)

III. List ALL lawsuits you (and your co-plaintiffs, if any) have filed in any state or federal court in the United States:

- A. Name of case and docket number: _____

- B. Approximate date of filing lawsuit: _____
- C. List all plaintiffs (if you had co-plaintiffs), including any aliases: _____

- D. List all defendants: _____

- E. Court in which the lawsuit was filed (if federal court, name the district; if state court, name the county): _____
- F. Name of judge to whom case was assigned: _____

- G. Basic claim made: _____

- H. Disposition of this case (for example: Was the case dismissed? Was it appealed? Is it still pending?): _____

- I. Approximate date of disposition: _____

IF YOU HAVE FILED MORE THAN ONE LAWSUIT, THEN YOU MUST DESCRIBE THE ADDITIONAL LAWSUITS ON ANOTHER PIECE OF PAPER, USING THIS SAME FORMAT. REGARDLESS OF HOW MANY CASES YOU HAVE PREVIOUSLY FILED, YOU WILL NOT BE EXCUSED FROM FILLING OUT THIS SECTION COMPLETELY, AND FAILURE TO DO SO MAY RESULT IN DISMISSAL OF YOUR CASE. CO-PLAINTIFFS MUST ALSO LIST ALL CASES THEY HAVE FILED.

IV. Statement of Claim:

State here as briefly as possible the facts of your case. Describe how each defendant is involved, including names, dates, and places. Do not give any legal arguments or cite any cases or statutes. If you intend to allege a number of related claims, number and set forth each claim in a separate paragraph. (Use as much space as you need. Attach extra sheets if necessary.)

On September 27, 2017 I was shower on tier 16
 When I came out the shower I was sitting on the table
 when the smv team came on a call for a 10/10 call
 involving another inmate that had nothing to do with me.
 They then requested that I lock up, so I walked to 1005
 house cell (my house) while walking to my cell I asked to
 speak with Sgt Jenkins from smv who was present at the time.
 but the officers told me no, so I then attempted to turn
 towards Jenkins while continuing to walk towards my cell
 but I was then assaulted by officer (smv Div 9) Matthews
 because he threw my face against the wall but while being
 thrown into the wall I was also assaulted by (smv Div 1)
 Brown he tore the ligaments in my thumb by pulling
 my thumb all the way back. that same ~~time~~ day
 (I wrote ^{that same day} a grievance and ORC never came to speak with
 me) I went to Cermak the following morning Sept 28th
 where my hand was placed in a cast splint.

I'm in Pain everyday in I ^{also} ~~also~~ Receiving
medicine (Pain meds) for my injury and cannot
do certain things I was able to do before
the incident. My Mental Stability has been
bothered because I am very nervous and scared
around a crowd of people. I also have nightmares
about this incident. I would like to ask that
to proper of disciplinary actions be done to
the officers involved in the altercation and
compensation for everything that happened to
me. Thank you

V. Relief:

State briefly exactly what you want the court to do for you. Make no legal arguments. Cite no cases or statutes.

The honorable court to award me compensatory-punitive damages for the unjustified actions of all of my defendants and any other compensation this honorable court deems necessary.

VI. The plaintiff demands that the case be tried by a jury. ☒ YES ☐ NO

CERTIFICATION

By signing this Complaint, I certify that the facts stated in this Complaint are true to the best of my knowledge, information and belief. I understand that if this certification is not correct, I may be subject to sanctions by the Court.

Signed this April day of 15, 2018

galv Hibbler
(Signature of plaintiff or plaintiffs)

Talen Hibbler
(Print name)

20161112051
(I.D. Number)

P.O. Box 089002, Chicago, IL, 60608
7224 S Yates Blvd 60619
(Address)

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UNITED STATES
MARSHALS SERVICE

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05/01/2018-1



Jalen Hubble #20164112051
Cook County Jail
P.O. Box 089002
Chicago, IL 60608

Office of
Clerk of The U.S. District Court
United States Courthouse
Chicago, IL 60604

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